

Integration of Soot-Blowing Emissions with Routine Operating Data for Existing Facilities

March 12, 1979

FROM:

Director, Division of Stationary Source Enforcement

TO:

Leslie Carothers, Director Enforcement Division, Region I

This is in response to your memo of January 25, 1979, concerning the effect of soot-blowing emission on determining compliance with particulate emission limitations. We have extensively examined the soot-blowing issue and its implications when determining compliance with the new source performance standard (NSPS) for fossil fuel-fired steam generators. We have determined that soot-blowing emissions must be included when performance tests are conducted to satisfy the requirements of the NSPS Subpart D. See attached memo for details on treatment of soot-blowing emissions.

The determination to include soot-blowing emissions under NSPS were significantly affected by the language in Part 60 which requires "...no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any affected facility any gas which..." This language provides us with the justification to include all emissions which are considered representative of the operation of the affected facility. Since soot-blowing occurs at regular intervals, these emissions cannot be discarded as being a result of an upset condition.

We do not know whether the language contained in the Maine state implementation plan (SIP) is consistent with the NSPS language in that it provides for a never to exceed emission limit. Any decision to include or exclude soot-blowing emissions must be judged by the language in a state's SIP. However, we believe that if the state SIP is silent on the issue of soot-blowing emissions in determining compliance of a source it would appropriate to interpret the never to exceed emission limit as requiring control of soot-blowing emissions.

This approach in dealing with existing sources may be more stringent than the averaging approach (see attached) we have elected to use in addressing new sources. Therefore, unless the SIP in a state specifically requires controlling soot-blowing emissions at all times, then we are recommending that the same method for determining compliance

with new sources be used for existing sources.

The approach for including soot-blowing emissions as described in the attached determination is to be used for compliance determinations for all new sources and all existing sources unless otherwise provided in the state SIP for existing sources.

If you have any additional questions or comments, please give me a call.

Edward E. Reich

cc:

Don Goodwin Enforcement Division Directors II-X

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